


certain dollar values into "whole dollar amounts." For example, the system could combine the \$20.50 previously used gift certificate with another previously used gift certificate of \$9.50 to make a new gift certificate of \$30.00 which would be more desirable to another consumer.

In contrast, the primary cited reference Chen simply discloses selling BRAND NEW gift certificates for unwanted and UNDESIRABLE restaurant time slots. Chen discloses trying to sell brand new, unused gift certificates which never been previously used or spent by a consumer. This is completely opposite to the present invention which is directed to PREVIOUSLY USED gift certificates and credits, e.g. multiple consumers have already used their gift certificates at least once and now have some leftover credit in odd amounts they want to sell to someone else, e.g. the gift certificates are sold to a secondary purchaser, while in Chen, the purchaser is the original purchaser.

Furthermore, Chen teaches selling undesirable time slots in restaurants by luring consumers with additional extra "rewards" (as cited by Examiner in Chen Col. 20, lines 14-27) to entice the consumer to purchase the undesirable time slot. These rewards in Chen are like additional incentives to purchase the undesirable time slot for the restaurant. Thus Chen uses the extra reward to help sell the restaurant gift certificate. In complete contrast, the present invention does not use such extra incentives to make the gift certificates more desirable, the gift certificates *themselves* are made desirable by the system combining them into certain whole dollar amounts.

Thus in view of the above, Chen clearly teaches away from the present invention and cannot be properly combined with Sandholm. Accordingly, Applicant respectfully requests allowance of the claims as amended. Examiner is invited to contact Applicant for an interview at Examiner's convenience.

Sincerely,


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